

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:  
GRAND SOLEIL - NATCHEZ, LLC

CHAPTER 7  
CASE # 11-01632NPO  
INVOLUNTARY

MOTION TO REQUIRE BOND UNDER 11 USC Section 303(e)

COMES NOW, Grand Soleil - Natchez, LLC, the alleged debtor, in the above referenced Chapter 7 involuntary case, by and through Counsel, and files this Motion to Require the Petitioning Creditors in this matter to File Bond Pursuant to Section 303(e) of the U.S. Bankruptcy Code, and in support of said motion shows the Court as follows:

1. Under Section 303(e), this Court has the authority to “require the petitioners under this section to file a bond to indemnify the debtor for such amounts as the Court may later allow” in the event the Involuntary Petition is subsequently dismissed.

2. The alleged debtor believes that there is a substantial likelihood that this involuntary petition may be dismissed for a number of reasons. In the event this matter is dismissed, U.S. Bankruptcy Code Section 303(i) grants the Court authority to grant a judgment against the petitioning creditor(s) for attorneys’ fees, expenses, costs and damages

3. The Court should require the petitioning creditor(s) to post a bond of not less than \$250,000.00 to indemnify the alleged debtor for such amounts as the Court may later allow under subsection (i).

WHEREFORE, PREMISES CONSIDERED, Grand Soleil - Natchez, LLC, prays that this Court, after notice and a hearing, require the petitioning creditor(s) to post a bond of not less than \$250,000.00 to indemnify the alleged debtor.

Dated: July 15, 2011.

Respectfully submitted,

/s/ L. Jackson Lazarus  
Attorney for Grand Soleil- Natchez, LLC

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CERTIFICATE OF SERVICE

I, L. Jackson Lazarus, attorney for Grand Soleil - Natchez, do hereby certify that I have this day caused to be mailed, via United States Mail, postage prepaid, a true and correct copy of the above and foregoing Motion for Continuance to:

Henry G. Hobbs, Jr  
United States Trustee  
[USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov)  
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This the 15<sup>th</sup> day of July, 2011.

/s/ L. Jackson Lazarus

